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Eduardo Lopez, Pro Se

Email Address

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Number and Street

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City, State, Zip

Downey CA 90240

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In Propria Persona

2024 DEC 23 PM 11:48

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY:

GSA

United States District Court
Central District of CaliforniaSUEROS&BEBIDAS REHIDRATANTES,
S.A. de C.V., a Mexican company,
and CAB ENTERPRISES, INC., a
Delaware corporation,

Plaintiffs,

vs.

Eduardo Lopez, Ivonne Munoz,
Manuel Vazquez, Yvonne Mesinas,
Surtimex LLC, a California
limited liability company, V&S
Investment Group, Surtimex
Global Inc., a California
Corporation, Distrubuidora
Vitian, S.A. de C.V., a Mexican
company, Leni's Industries,
Inc., a California corporation,

Defendants.

ET AL

Case Number: 2:24-cv-10102

ANSWER TO COMPLAINT

COMES NOW, Defendant Eduardo Lopez, pro se, and makes his answer

To the complaint filed in the above-entitled matter by admitting, or denying each and every allegation set forth therein as follows:

1. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 1 of the complaint and therefore, on that basis, denies those allegations in their entirety.

2. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 2 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

3. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 3 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

4. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 4 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

5. This answering defendant does hereby deny the allegations set forth in paragraph 5 of the complaint in their entirety.

6. This answering defendant does hereby deny the allegations set forth in paragraph 6 of the complaint in their entirety.

7. This answering defendant does hereby deny the allegations set forth in paragraph 7 of the complaint in their entirety.

8. This answering defendant does hereby deny the allegations set forth in paragraph 8 of the complaint in their entirety.

9. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 9 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

10. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 10 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

11. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 11 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

12. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 12 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

13. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 13 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

14. This answering defendant admits the allegations set forth in paragraph 14 of the complaint, except for any allegations that the offer of sale, or sale of Electrolit by Eduardo Lopez is unauthorized which allegation is denied.

15. This answering defendant does hereby deny the allegations set forth in paragraph 15 of the complaint in their entirety.

16. This answering defendant admits the allegations set forth in paragraph 15 of the complaint, except for any allegations that the offer of sale, or sale of Electrolit by Yvonne Munoz is unauthorized which allegation is denied.

17. This answering defendant does hereby deny the allegations set forth in paragraph 17 of the complaint in their entirety.

18. This answering defendant admits the allegations set forth in paragraph 18 of the complaint.

19. This answering defendant does hereby deny the allegations set forth in paragraph 19 of the complaint in their entirety.

20. This answering defendant does hereby deny the allegations set forth in paragraph 20 of the complaint in their entirety.

21. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 21 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

22. This answering defendant admits the allegations set forth in paragraph 22 of the complaint.

23. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 23 of the complaint and therefore, on that basis, does hereby deny those

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allegations in their entirety.

24. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 24 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

25. This answering defendant admits the allegations set forth in paragraph 25 of the complaint.

26. This answering defendant admits the allegations set forth in paragraph 26 of the complaint.

27. This answering defendant admits the allegations set forth in paragraph 27 of the complaint.

28. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 28 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

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29. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 29 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

30. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 30 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

31. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 31 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

32. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 32 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

33. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 33 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

34. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 34 of the

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complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

35. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 35 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

36. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 36 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

37. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 37 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

38. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 24 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

39. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 24 of the complaint and therefore, on that basis, does hereby deny those

40. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 40 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

41. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 41 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

42. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 42 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

43. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 43 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

44. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 44 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

45. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 45 of the
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complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

46. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 46 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

47. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 47 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

48. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 48 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

49. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 49 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

50. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 50 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.
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51. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 51 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

52. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 52 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

53. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 53 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

54. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 54 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

55. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 55 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

56. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 56 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

57. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 40 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

58. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 40 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

59. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 59 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

60. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 60 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

61. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 61 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

62. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 62 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

63. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 63 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

64. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 40 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

65. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 65 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

66. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 66 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

67. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 67 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

68. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 68 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

69. This answering defendant lacks sufficient information

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70. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 70 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

71. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 71 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

72. This answering defendant does hereby deny the allegations set forth in paragraph 72 of the complaint in their entirety.

73. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 73 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

74. This answering defendant admits the allegations set forth in paragraph 74 of the complaint, except for any allegations that individuals perform any alleged activities in their personal capacity and the offer of sale, or sale of Electrolit is unauthorized, which allegations are denied.

75. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 75 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

76. This answering defendant does hereby deny the allegations set forth in paragraph 76 of the complaint in their entirety.

77. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 77 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

78. This answering defendant does hereby deny the allegations set forth in paragraph 78 of the complaint in their entirety.

79. This answering defendant does hereby deny the allegations set forth in paragraph 79 of the complaint in their entirety.

80. This answering defendant does hereby deny the allegations set forth in paragraph 80 of the complaint in their entirety.

81. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 81 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

82. This answering defendant does hereby deny the allegations set forth in paragraph 82 of the complaint in their entirety.

83. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 83 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

84. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 84 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

85. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 85 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

86. This answering defendant does hereby deny the allegations set forth in paragraph 82 of the complaint in their entirety.

87. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 87 of

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88. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 88 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

89. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 89 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

90. This answering defendant does hereby deny the allegations set forth in paragraph 90 of the complaint in their entirety.

91. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 91 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

92. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 92 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

93. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 93 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

94. This answering defendant does hereby deny the allegations set forth in paragraph 94 of the complaint in their entirety.

95. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 95 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

96. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 96 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

97. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 97 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

98. This answering defendant does hereby deny the allegations set forth in paragraph 98 of the complaint in their entirety.

99. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 99 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

100. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 100 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

101. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 101 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

102. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 102 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

103. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 103 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

102. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 104 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

105. This answering defendant does hereby deny the allegations set forth in paragraph 105 of the complaint in their entirety.

106. This answering defendant does hereby deny the allegations set forth in paragraph 106 of the complaint in their entirety.

107. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 107 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

108. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 108 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

109. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 109 in direct accordance with This answering defendant ' answer to the allegations therein referenced by incorporation.

110. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 110 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

111. This answering defendant does hereby deny the allegations set forth in paragraph 111 of the complaint in their entirety.

112. This answering defendant does hereby deny the allegations set forth in paragraph 112 of the complaint in their entirety.

113. This answering defendant does hereby deny the allegations set forth in paragraph 113 of the complaint in their entirety.

114. This answering defendant does hereby deny the allegations set forth in paragraph 114 of the complaint in their entirety.

115. This answering defendant does hereby deny the allegations set forth in paragraph 115 of the complaint in their entirety.

116. This answering defendant does hereby deny the allegations set forth in paragraph 116 of the complaint in their entirety.

117. This answering defendant does hereby deny the allegations set forth in paragraph 117 in their entirety.

118. This answering defendant does hereby deny the allegations set forth in paragraph 118 of the complaint in their entirety.

119. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 119 in direct accordance with This answering defendant ' answer to the allegations therein referenced by incorporation.

120. This answering defendant does hereby deny the allegations set forth in paragraph 120 of the complaint in their entirety.

121. This answering defendant does hereby deny the allegations set forth in paragraph 121 of the complaint in their entirety.

122. This answering defendant does hereby deny the allegations set forth in paragraph 122 of the complaint in their entirety.

123. This answering defendant does hereby deny the allegations set forth in paragraph 123 of the complaint in their entirety.

124. This answering defendant does hereby deny the allegations set forth in paragraph 124 of the complaint in their entirety.

125. This answering defendant does hereby deny the allegations set forth in paragraph 125 of the complaint in their entirety.

126. This answering defendant lacks sufficient information

127. This answering defendant does hereby deny the allegations set forth in paragraph 127 of the complaint in their entirety.

128. This answering defendant does hereby deny the allegations set forth in paragraph 128 of the complaint in their entirety.

129. This answering defendant does hereby deny the allegations set forth in paragraph 129 of the complaint in their entirety.

130. This answering defendant does hereby deny the allegations set forth in paragraph 130 of the complaint in their entirety.

131. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 131 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

132. This answering defendant does hereby deny the allegations set forth in paragraph 132 of the complaint in their entirety.

133. This answering defendant does hereby deny the allegations set forth in paragraph 133 of the complaint in their entirety.

134. This answering defendant does hereby deny the allegations set forth in paragraph 134 of the complaint in their entirety.

135. This answering defendant does hereby deny the allegations set forth in paragraph 135 of the complaint in their entirety.

136. This answering defendant does hereby deny the allegations set forth in paragraph 136 of the complaint in their entirety.

137. This answering defendant does hereby deny the allegations set forth in paragraph 137 of the complaint in their entirety.

138. This answering defendant does hereby deny the allegations set forth in paragraph 138 of the complaint in their entirety.

139. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 139 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

140. This answering defendant does hereby deny the allegations set forth in paragraph 140 of the complaint in their entirety.

141. This answering defendant does hereby deny the allegations set forth in paragraph 141 of the complaint in their entirety.

142. This answering defendant does hereby deny the allegations set forth in paragraph 142 of the complaint in their entirety.

143. This answering defendant does hereby deny the allegations set forth in paragraph 143 of the complaint in their entirety.

144. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 144 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

145. This answering defendant does hereby deny the allegations set forth in paragraph 145 of the complaint in their entirety.

146. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 146 in direct accordance with This answering defendant ' answer to the allegations therein referenced by incorporation.

147. This answering defendant does hereby deny the allegations set forth in paragraph 147 of the complaint in their entirety.

148. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 148 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

149. This answering defendant does hereby deny the allegations set forth in paragraph 149 of the complaint in their entirety.

150. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 150 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

151. This answering defendant does hereby deny the allegations set forth in paragraph 151 of the complaint in their entirety.

152. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 152 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

153. This answering defendant does hereby deny the allegations set forth in paragraph 153 of the complaint in their entirety.

154. This answering defendant does hereby deny the allegations set forth in paragraph 154 of the complaint in their entirety.

155. This answering defendant does hereby deny the allegations set forth in paragraph 155 of the complaint in their entirety.

156. This answering defendant does hereby deny the allegations set forth in paragraph 156 of the complaint in their entirety.

157. This answering defendant does hereby deny the allegations set forth in paragraph 157 of the complaint in their entirety.

158. This answering defendant does hereby deny the allegations set forth in paragraph 158 of the complaint in their entirety.

159. This answering defendant does hereby deny the allegations set forth in paragraph 159 of the complaint in their entirety.

160. This answering defendant does hereby deny the allegations set forth in paragraph 160 of the complaint in their entirety.

161. This answering defendant does hereby deny the allegations set forth in paragraph 161 of the complaint in their entirety.

162. This answering defendant does hereby deny the allegations set forth in paragraph 162 of the complaint in their entirety.

163. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 163 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

164. This answering defendant does hereby deny the allegations set forth in paragraph 164 of the complaint in their entirety.

165. This answering defendant does hereby deny the allegations set forth in paragraph 165 of the complaint in their entirety.

166. This answering defendant does hereby deny the allegations set forth in paragraph 166 of the complaint in their entirety.

167. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 167 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

168. This answering defendant does hereby deny the allegations set forth in paragraph 168 of the complaint in their entirety.

169. This answering defendant does hereby deny the allegations set forth in paragraph 169 of the complaint in their entirety.

170. This answering defendant does hereby deny the allegations set forth in paragraph 170 of the complaint in their entirety.

171. This answering defendant does hereby deny the allegations set forth in paragraph 171 of the complaint in their entirety.

172. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 172 in direct accordance with this answering defendant's answer to

the allegations therein referenced by incorporation.
173. This answering defendant does hereby deny the allegations set forth in paragraph 173 of the complaint in their entirety.

174. This answering defendant does hereby deny the allegations set forth in paragraph 174 of the complaint in their entirety.

175. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 175 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

176. This answering defendant does hereby deny the allegations set forth in paragraph 176 of the complaint in their entirety.

177. This answering defendant does hereby deny the allegations set forth in paragraph 177 of the complaint in their entirety.

178. This answering defendant does hereby deny the allegations set forth in paragraph 178 of the complaint in their entirety.

179. This answering defendant does hereby deny the allegations set forth in paragraph 174 of the complaint in their entirety.

180. This answering defendant does hereby deny the allegations set forth in paragraph 180 of the complaint in their entirety.

181. This answering defendant does hereby deny the allegations set forth in paragraph 181 of the complaint in their entirety.

182. This answering defendant does hereby deny the allegations set forth in paragraph 182 of the complaint in their entirety.

183. This answering defendant does hereby deny the allegations set forth in paragraph 183 of the complaint in their entirety.

184. This answering defendant does hereby deny the allegations set forth in paragraph 184 of the complaint in their entirety.

185. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 185 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

186. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 186 of the complaint and therefore, on that basis, does hereby deny those allegations in their entirety.

187. This answering defendant does hereby deny the allegations set forth in paragraph 187 of the complaint in their entirety.

188. This answering defendant does hereby deny the allegations set forth in paragraph 188 of the complaint in their entirety.

189. This answering defendant does hereby deny the allegations set forth in paragraph 189 of the complaint in their entirety.

190. This answering defendant does hereby deny the allegations set forth in paragraph 190 of the complaint in their entirety.

191. This answering defendant does hereby deny the allegations set forth in paragraph 191 of the complaint in their entirety.

192. This answering defendant does hereby deny the allegations set forth in paragraph 192 of the complaint in their entirety.

193. This answering defendant does hereby deny the allegations set forth in paragraph 193 of the complaint in their entirety.

194. This answering defendant does hereby deny and admit the allegations set forth and/or incorporated by reference in paragraph 194 in direct accordance with this answering defendant's answer to the allegations therein referenced by incorporation.

195. This answering defendant does hereby deny the allegations set forth in paragraph 195 of the complaint in their entirety.

196. This answering defendant lacks sufficient information and/or belief to admit the allegations set forth in paragraph 196

197. This answering defendant does hereby deny the allegations set forth in paragraph 197 of the complaint in their entirety.

AFFIRMATIVE DEFENSES

As and for its separate, alternative, affirmative defenses to the allegations made against it in the complaint filed in the above-entitled matter, defendant avers and alleges as follows:

Affirmative Defense No. 1

The parties have reached accord and satisfaction as to some, or all of the causes of action alleged in the complaint;

Affirmative Defense No. 2

Plaintiffs have expressly, or impliedly assumed the risk of each and every peril that is the subject of some, or all of the complaint filed in the above-entitled matter.

Affirmative Defense No. 3

Plaintiffs have voluntarily assumed the risk of any course of action alleged to have been taken upon by This answering defendant

Affirmative Defense No. 4

To the extent that any cause alleged against This answering defendant in the complaint includes negligence on the part of This answering defendant, any damage resulting therefrom must be reduced by a sum according to proof as a result of plaintiffs' contributory negligence.

Affirmative Defense No. 5

Plaintiffs are estopped from instituting and/or maintaining this action against this answering defendant.

Affirmative Defense No. 6

Plaintiffs' fraud is the actual and proximate cause of any damage alleged to have accrued to plaintiffs in this matter.

Affirmative Defense No. 7

Any right or rights asserted by plaintiffs to accrue to them in this matter is/would be illegal if applied, or enforced.

Affirmative Defense No. 8

This action and any remedy that may accrue to plaintiffs as a result of any allegation, or allegations set forth in plaintiffs' complaint is barred by the doctrine of laches.

Affirmative Defense No. 9

At the time this answering defendant is alleged to have performed unlawful actions, he was doing so, if at all, under valid and subsisting license from the plaintiffs or otherwise lawfully obtained license.

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Affirmative Defense No. 10

This action is barred in whole or in part by the doctrine of res judicata.

Affirmative Defense No. 11

This action is barred by the applicable statute of limitation.

Affirmative Defense No. 12

Plaintiffs have expressly, or impliedly waived any rights, or claims they may have against this answering defendant.

Affirmative Defense No. 13

Plaintiffs lack standing to assert the causes of action set forth in the complaint.

Affirmative Defense No. 14

Any trademark that inures to the benefit of plaintiffs are unenforceable by reason of plaintiffs' present and past use of those marks in a constant and systematic manner to circumvent the antitrust laws and to stifle competition as provided in 15 U.S.C. § 1115(b)(7)

WHEREFORE, This answering defendant prays:

1. That plaintiffs take nothing by way of their action;
2. That judgment enter in favor of this answering defendant on each and every cause alleged by plaintiffs;
3. For an award of costs of this action, including a reasonable

4. For such other and further relief as the court deems appropriate.

Dated: 12/22/24


Eduardo Lopez, Pro Se

emyr1993@hotmail.com
Email Address

7652 Coolgrove Dr
Number and Street

Downey CA 90240
City, State, Zip

(310) 213-9909
Area Code and Telephone

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PROOF OF SERVICE

I Everardo Rosales Contreras, do hereby certify that:

E.R.
In the matter of SUEROS&BEBIDAS REHIDRATANTES, S.A. de C.V., a Mexican company, and CAB ENTERPRISES, INC., a Delaware corporation, Plaintiffs, vs. Eduardo Lopez, Ivonne Munoz, Manuel Vazquez, Yvonne Mesinas, Surtimex LLC, a California limited liability company, V&S Investment Group, Surtimex Global Inc., a California corporation Distrubuidora Vitian, S.A. de C.V., a Mexican company, Leni's Industries, Inc., a California corporation, Defendants, United States District Court, Central District of California, Case Number 2:24-cv-10102. , on the date subscribed below, I served a true copy of the attached Answer of Eduardo Lopez to the Complaint in that matter on the parties listed below by placing that document into an envelope, with the recipient's address clearly printed and visible on the exterior thereof, sealed that envelope and deposited it for delivery with the United Staes Postal Service, at:

Downey, California with First Class Postage prepaid.

My business, or residence address is:

1325 1/2 Walnut St, Los Angeles CA
90011, California and I am over the age of eighteen (18) years and not a party to the action described above.

The parties served and their addresses are:

□

Samantha K. Burdick
Alston and Bird LLP
350 South Grand Avenue 51st Floor
Los Angeles, CA 90071

Charles W. Cox, II
Alston and Bird LLP
350 South Grand Avenue, 51st Floor
Los Angeles, CA 90071

Alston and Bird LLP
90 Park Avenue, 15th Floor
New York, NY 10016

William A Romaine
Romaine Lokhandwala Law Group, LLP
3323 South Fairway Street Suite 5
Visalia, CA 93277

☐

I declare under penalty of perjury that the
foregoing is true of my own knowledge.

Date: 12/22/24

Everardo Rosales Contreras

Print Name of

Person Serving